

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

**In re: John E. Fowler
Donica S. King
Debtor(s)**

**Chapter 13
Case No. 12-13300**

MOTION TO REOPEN CHAPTER 13 CASE

This Court, upon motion and consent of the U.S. Trustee, finds as follows:

1. That Debtors filed for protection under Chapter 13 of the United States Bankruptcy Code on August 10, 2012 and received a discharge on February 15, 2018. The Final Decree/Order Closing Case was entered on June 5, 2018 (dkt#96).
2. Debtor(s) wish to reopen this case to file an Adversary Proceeding to determine validity, priority, and extent of the lien of the second mortgage of Nationstar Mortgage, LLC d/b/a Mr. Cooper.

WHEREFORE DEBTOR PRAYS THAT:

This Chapter 13 case be reopened to allow the debtors to file an Adversary Proceeding to determine validity, priority, and extend of the lien of the second mortgage of Nationstar Mortgage, LLC d/b/ Mr. Cooper and for such further relief as this Court deems appropriate.

Respectfully Submitted,

/s/ Kevin F. O'Brien
Kevin F. O'Brien #10731
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CERTIFICATE OF SERVICE

The undersigned individual hereby certifies that he, on this 10th day of September 2020, electronically delivered true and correct copies of the attached "Motion to Reopen Chapter 13 Case" to the following parties at the addresses below:

U.S. Trustee
Ustpreions05.ab.ecf@usdoj.gov

Locke Barkley, Trustee
sbeasley@barkley13.com

**Nationstar Mortgage, LLC d/b/a Mr. Cooper
c/o Corporation Service Company, registered agent
7716 Old Canton Rd. Suite C.
Madison, MS 39110**

/s/ Kevin F. O'Brien
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